

REMARKS

Claims 1-17 are pending in the present application. Claims 1-17 have been rejected by the Examiner.

Claims 1-12, 14 and 17 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Wong (U.S. Patent N. 6,260,021) in view of Moshfeghi (U.S. Patent No. 6,076,166) and Hu (U.S. Patent Publication No. 2003/0126279).

The Applicant agrees with the examiner that Wong fails to expressly teach the RIS and PACS databases residing on a database server. The Applicant respectfully disagrees with the Examiner's assertion that Moshfeghi discloses an interface between RIS and PACS databases residing on a database server. Moshfeghi discloses computer based patient records (CPR) residing on separate CPR databases. (Moshfeghi; Col. 2, 50-55). Moshfeghi does not disclose any communication between CPR databases. Claim 1 of the present application recites, among other things, a database engine residing on the *same database server* to manage the RIS database and the PACS database by providing a brokerless interface *between* the RIS database and the PACS database. Moshfeghi discloses a broker-driven system with the motivation to facilitate a connection between a client and a CPR database. (Moshfeghi; Col. 2, 55-63). Thus, Moshfeghi discusses Client – CPR connections, but does not disclose any interfaces *between* CPR databases much less "a (RIS) and (PACS) databases residing on database server".

The Applicant agrees with the examiner that Wong and Moshfeghi fail to teach a brokerless interface between said RIS and PACS database. The Applicant respectfully

disagrees with the Examiner's assertion that Hu discloses a brokerless interface between said RIS database and said PACS database. Hu does not disclose a RIS database.

Hu discloses a PACS system with no mention of the connection to a RIS system. Hu discloses a decentralized PACS system as a motivation to minimize network traffic in a hospital during peak usage (Hu; paragraphs: 0022 and 0023). Claim 1 of the present application recites, among other things, a database engine residing on the database server to manage the RIS database and the PACS database by providing a *brokerless interface between the RIS database and the PACS database*. Hu discloses that RIS and PACS share a common network and that less network traffic could help integrate the two systems (Hu; 0022). Hu does not disclose an interface between a RIS database and PACS database. Hu does not disclose a brokerless interface between any databases. Hu explicitly discloses a coordinator to handle the transfer of associated information (Hu; 0058). A brokerless interface is one where there is no broker or coordinator needed to interface.

Thus Hu discloses a PACS system without disclosing an interface between databases, much less a brokerless interface.

Accordingly, for at least the reasons given above, the Applicant submits that claims 1-17 are allowable over Wong in view of Moshfeghi and Hu. Action to that effect is respectfully requested.

Claims 13 and 16 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Wong, Moshfeghi, and Hu further in view of Crane (U.S. Patent No. 5,748,907). Crane discloses neither a PACS nor a RIS. Further, Crane discloses nothing

regarding a database engine providing a brokerless interface between a PACS and a RIS. Thus, the disclosure of Crane does nothing to cure the deficiencies of Wong, Moshfeghi, and Hu with respect to independent claim 1, from which claims 13 and 16 depend. Therefore, the Applicant respectfully submits that claims 13 and 16 should also be allowable over the cited art of record.

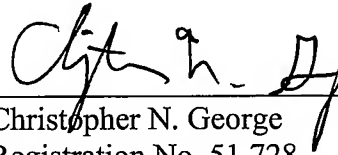
Claim 15 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Wong, Moshfeghi, and Hu further in view of Segal (U.S. Pat. Pub. No. 2001/0041991A1). However, Segal does not disclose a system with both a PACS and a RIS. Further, Segal discloses nothing regarding a database engine providing a brokerless interface between a PACS and a RIS. Thus, the disclosure of Segal also does nothing to cure the deficiencies of Wong, Moshfeghi, and Hu with respect to independent claim 1, from which claim 15 depends. Therefore, the Applicant respectfully submits that claim 15 should also be allowable over the cited art of record.

The prior art made of record but not relied upon by the Examiner in rejecting claims 1-17 also fails to teach or suggest all of the limitations recited in the pending claims at least because none of the cited references discloses a brokerless interface between a PACS and a RIS.

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The Applicant submits that the claims of the present application define allowable subject matter. If the Examiner has any questions or if the Applicant can be of any assistance, the Examiner is invited and encouraged to contact the Applicant at the number below. The Commissioner is authorized to charge any necessary fees or credit any overpayment to the Deposit Account of GEMS-IT, Account No. 502401.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Christopher N. George", is written over a horizontal line.

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Date: August 7, 2007

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